

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**VELMA SMITH, Individually and on  
Behalf of All Others Similarly Situated**

**PLAINTIFF**

**v.**

**Civil Action No. 3:23-cv-357-KHJ-MTP**

**TRANSAMERICA CORPORATION, et al.**

**DEFENDANTS**

**PLAINTIFF’S RESPONSE IN OPPOSITION TO DEFENDANT TATA AMERICAN  
INTERNATIONAL CORPORATION’S MOTION TO DISMISS FIRST AMENDED  
COMPLAINT (Dkt. 78) AND IN OPPOSITION TO TATA AMERICAN  
INTERNATIONAL CORPORATION AND TATA CONSULTANCY SERVICES  
LIMITED’S JOINDER IN TLIC’S MOTION TO DISMISS CLASS ACTION  
COMPLAINT (dkt. 77)**

Plaintiff Velma Smith, by and through counsel of record, files this Response in Opposition to Defendant Tata American International Corporation’s (“TAIC”) Motion to Dismiss the First Amended Complaint (Dkt. No. 78) and Opposing Tata Consultancy Services Limited and Tata American International Corporation’s (“TCS”) Joinder in Motions to Dismiss Class Action (Dkt. No. 77). In further support of this Response in Opposition, Plaintiff submits its Memorandum of Law in support hereof, as well as the following two exhibits: (1) Exhibit “1”—Mississippi Secretary of State filing for Defendant Tata American International Corporation; and (2) January 11, 2018, Press Release.

As is more fully detailed in the Memorandum of Law in Support of this Response, the Court has both general and specific jurisdiction over Defendant Tata American International Corporation. Further, Plaintiff has sufficiently pleaded viable causes of action for each of her counts against Tata American International Corporation and Tata Consultancy Services Limited. Defendant Tata American International Corporation’s Motion to Dismiss and its and Tata Consultancy Services Limited’s Joinder in TLIC’s Motion to Dismiss Class Action should be denied *in toto*.

Respectfully submitted this the 7<sup>th</sup> day of November, 2023.

PLAINTIFF VELMA SMITH

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**CERTIFICATE OF SERVICE**

The undersigned counsel does hereby certify that he has this day served a true and correct copy of the above and foregoing upon all counsel of record via the Court's ECF system.

SO CERTIFIED this the 7<sup>th</sup> day of November, 2023.

/s/ Gary M. Yarborough, Jr.  
Gary M. Yarborough, Jr